

EXHIBIT F

**Excerpts from Deposition of Matthew Anderson,
Former Frontier Employee and Former Member
Of the “Denver Team” of Customer Relations**

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022

1

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF NEVADA

3 -ooOoo-

4 PETER DELVECCHIA, et al.,)
5 Plaintiffs,)
6 v.) Case No.
7) 2:19-CV-01322-KJD-DJA
8 FRONTIER AIRLINES, INC.,)
et al.,)
9 Defendants.)
-----)

10

11

12

13

14

15 Deposition of MATTHEW ANDERSON

16 Taken on January 25, 2022
17 At 8:59 a.m. to 12:35 p.m. MST

18 Via Videoconference

19

20

21

22

23

24

25 Reported by: Deirdre Rand, RPR, CCR
Nevada CCR# 992

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022
52

1 complaining party, did you have to somehow make it an
2 email? Like select email somewhere in the system?

3 A. Correct. I believe it would have to be
4 initiated by an agent.

5 Q. Okay. So then in addition to the text that's
6 in the CRM system, in many cases there would also be
7 emails between the person handling the complaint on the
8 team and the person who made the complaint, correct?
09:58

9 A. Potentially correct, yes.

10 Q. And wasn't that a rather normal function of
11 your job to send emails out to complaining passengers?
09:59

12 A. Not my role, specifically. I would not call
13 that part of our team's process.
09:59

14 Q. Well, how -- who was responsible for sending
15 those emails then?
09:59

16 A. Again, I don't know how the other levels of
17 customer relations in the organization worked. It could
18 have originated there, but I don't know their process.

19 Q. Well, let's say that you are working on a
20 complaint and you use one of these templates. For
21 instance, "Based on the information provided, we don't
22 feel the described behavior was based on discrimination
23 or prejudice." If you just put that in the CRM notes,
24 that's not a communication to the passenger, is it?
09:59

25 A. Depending on how it is in the CRM, it could
10:00

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022
59

1 Q. What were some of the other subjects?

2 A. It encompassed everything flight-related.

3 It could have been delays, lost luggage, anything in
4 regards to the travel experience.

5 Q. Okay. And is this instance where you
6 communicated back a positive finding of previous
7 complaints the only one that you can remember? 10:08

8 A. That would be the only one I can recall
9 that --

10 Q. Do you think it was the only -- I'm sorry. 10:09
11 I didn't mean to interrupt you. Go ahead.

12 A. That would be the only one I can recall that
13 involves, you know, me sending that to the DOT, that we
14 had looked into that and found other complaints.

15 Q. Did you have a database available to you that
16 would enable you to find out if there had been previous
17 complaints against a particular employee? 10:09

18 A. No. That would be with in-flight.

19 Q. Okay. So you would have to ask in-flight to
20 look through their records? 10:09

21 A. Correct. That was not part of our team's
22 process.

23 Q. Okay.

24 Did your team have any kind of investigative
25 authority? 10:09

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022
60

1 A. I wouldn't -- very little, I would say.

2 Q. Okay. What could you do to find out
3 information about a complaint?

4 A. So our process was to reach out to the teams
5 involved and then ask them for reports, so that we could
6 document it in the CRM and record it.

7 Q. Okay. So all of those reports would come from
8 employees of Frontier, right?

9 A. Correct.

10 Q. The statements that you received would be from
11 crew members, right?

12 A. Correct.

13 Q. And those are people who could potentially
14 face discipline or even termination of their jobs if
15 they admitted doing something wrong, right?

16 A. I don't know HR procedures at Frontier.
17 I can't -- wouldn't be able to speak as to what the
18 process would be there.

19 Q. Well, you were an employee of Frontier,
20 weren't you?

21 A. Yes.

22 Q. Did you understand that if you did something
23 that violated Frontier's policies or violated the law,
24 that you could be disciplined or even fired?

25 A. That was personally my understanding, yes.

10:10

10:10

10:10

10:10

10:11

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022

64

1 know, our -- I don't believe our team's process was
2 necessarily investigative. It was to gather information
3 and report it. But...

4 Q. Okay. So you're saying that your role was not
5 investigative, but it was to collect information. Did
6 I hear you correctly? 10:14

7 A. Correct. Collect information from the
8 appropriate teams.

9 Q. Okay. So your role -- the role of your team
10 was to collect information that only typically came from
11 other employees of the company, correct? 10:14

12 A. Correct. We primarily reached out to our
13 internal teams.

14 Q. Okay. You didn't, for instance, reach out to
15 other passengers on the same flight as the person who
16 was complaining? 10:15

17 A. That was not part of our process.

18 Q. So it was something that was frowned upon?

19 A. No.

20 Q. It just wasn't done? 10:15

21 A. Our process was to reach out to our internal
22 teams, get the information, and report it on the CRM.

23 Q. Okay. So it was -- it did not include
24 reaching out to other passengers of the same flight;
25 is that correct? 10:15

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022

65

1 A. Not that I can recall, no.

2 Q. Okay. So it didn't include that?

3 A. Not that -- no.

4 Q. Okay. This is just an instance where I just
5 want to make sure that the question and the answer --
6 that we're both saying the same thing.
10:15

7 So the process that you did as a customer
8 relations advocate was limited to receiving information
9 from other employees, correct?
10:16

10 A. Yes.
10:16

11 Q. Okay.

12 Do you know anything, as you sit here today,
13 about whether or not Frontier has a policy, an internal
14 policy, that forbids discrimination by its employees
15 against passengers based on their race or their
16 ethnicity?
10:16

17 A. I don't recall any specifics with any Frontier
18 policies at this time.
10:16

19 Q. Did you ever know anybody who worked for
20 Frontier who was accused of violating any Frontier
21 policy?
10:16

22 A. Not that I can recall specifically.

23 Q. Okay. So you wouldn't know, as you sit here
24 today, of anybody who has ever been disciplined or fired
25 for violating a Frontier policy, correct?
10:17

MATTHEW ANDERSON
DELVECCHIA V FRONTIER AIRLINES

January 25, 2022
66

1 A. Correct. That would not have been in our
2 team's purview. That would fall under HR, I'm sure.

3 Q. Okay. Did you have the ability to recommend
4 to anyone in the company that a person who was the
5 subject of a passenger or customer complaint be
6 disciplined in any way? 10:17

7 A. That was -- no, that was not our team's
8 process. We would share the information with the
9 appropriate team, but we did not make recommendations.

10 Q. And what were the teams that you shared
11 information with? 10:17

12 A. Our in-flight team was one. We had a baggage
13 team. That's the primary ones I can recall.

14 Q. Okay.

15 If you shared information about a complaint
16 with one of those teams, did the team ever report back
17 to you any further follow-up or what it did about the
18 information? 10:18

19 A. No. That was not part of our team's
20 collection process. You know, that -- employment
21 matters were not part of our purview. 10:18

22 Q. So if you told a customer that you were going
23 to share the information with the in-flight team, for
24 example, for possible retraining or further follow-up,
25 you wouldn't know whether any retraining or further 10:18